



Rebecca J. Dulin

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January 24, 2013

VIA ELECTRONIC FILING

Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, SC 29211

Re: Application of CYBH, LLC d/b/a Coastal Storage & Moving for a Class E (Household Goods) Certificate of Public Convenience and Necessity for Operation of a Motor Vehicle Carrier; Docket No. 2012-314-T

Dear Jocelyn:

On behalf of CYBH, LLC d/b/a Coastal Storage & Moving (the "Applicant"), and pursuant to Commission Rule 103-834, I am writing to request that the Commission grant the Applicant leave to take the deposition of the following shipper witness at a date and time to be agreed upon by the parties in the above-referenced Docket:

MaryAnne Dorio
Coastal Real Estate Pros
550 Forestbrook Road, STE 300
Myrtle Beach, SC 29579

In lieu of an appearing at the hearing in this case, the above witness would testify as the Applicant's shipper witness via telephonic deposition. Allowing testimony in this manner will accommodate the schedule of the witness, whose business is located in Myrtle Beach, SC. Requiring this witness to appear at the hearing would cause strain on the witness's responsibilities to her real estate business.

The facts that Applicant seeks to establish by deposition are those that support Applicant's application in this Docket: that demand exists for household goods moving services that is not currently being met.

The Applicant requests that the deposition take place at a time mutually agreed upon by the parties at the offices of Parker Poe Adams & Bernstein, 1201 Main Street, 14th Floor, Columbia, South Carolina 29201. The Applicant will arrange for all parties to be connected via telephone conference.

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Additionally, the Applicant requests that the Commission reschedule for a later date the hearing in this Docket currently scheduled for Wednesday, January 30, 2013 at 10:30am. Postponing the hearing will provide time for the Commission's consideration of the Applicant's request to depose its shipper witness. In the event the Commission approves the Applicant's request to depose its shipper witness, postponing the hearing will provide time for the deposition to occur and for the transcript to be filed in the Docket prior to the hearing. I have spoken to counsel for the South Carolina Office of Regulatory Staff ("ORS") regarding these requests, and the ORS does not object.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca J. Dulin

Rebecca J. Dulin

RJD:bg
Enclosures

cc: Courtney Dare Edwards, Esq. (via email: cedwards@regstaff.sc.gov and U.S. Mail)
Jessie S. McClary, III (via U.S. Mail)